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United States Department of the Interior

BUREAU OF RECLAMATION

Ephrata Field Office

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EPH-2212

ENV-8.00

MAY 14 2015

Mr. Patrick Lizon
Water Quality Assessment Coordinator
Washington State Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Subject: Draft Department of Ecology (Ecology) Proposed Washington State Water Quality Assessment for Freshwater: Update 303(d)-Listings Comments, Columbia Basin Project (Project), Washington

Dear Mr. Lizon:

Thank you for the opportunity to review and comment on the proposed Water Quality Freshwater Assessment (Assessment) to update the 303(d)-list for Washington State (State). The Assessment fulfills the State's Federal Clean Water Act obligation, for sections 303(d) and 305(b), to identify impaired waterbodies and categorize their water quality status (category 5 represent the 303(d)-listed waters). Many of the surface waterbodies in the State have multiple category listings for various parameters that chronicle the impairments that compromise the designated beneficial uses established for each waterbody.

The Bureau of Reclamation has a significant number of irrigation facilities (facilities) throughout the State, which include reservoirs, canals, laterals, wasteways, drains, and buried pipe drains. Ecology has designated many of Reclamation's facilities with the appropriate name and designation. However, there are still many facilities that are designated as unnamed ditches. Reclamation requests that Ecology establish the appropriate names and designations for the remaining facilities referred to as unnamed ditch in the Assessment so there is no confusion between the facilities and the natural features. Reclamation can furnish Ecology with the facility names.

Irrigation projects such as the Project are unlike natural systems. They are characteristic of large flows at the headwaters and reduced flows at confluences and facility terminus' (end of the facility). Reclamation would like Ecology to classify the facilities as man-made not lakes, rivers, streams, or creeks. The association of the facilities with the natural features misconstrues the actual complexity of these features. Further, Reclamation would like the facilities listed in the Assessment referred to by their proper name or designation for clarity between the man-made and natural features.

Ecology has been acquiring Project water quality data from STORET dating back to the late 1990's. The data has been used by Ecology to assess waterbody impairments. The data in

STORET is Project data that has been validated by the laboratory for Quality Assurance/Quality Control (QA/QC). However, QA/QC has not been fully applied to the data that is entered into STORET; therefore, the data is still classified as raw data by Reclamation. According to Chapter 1, of the Water Quality Program Policy (WQP Policy) 1-11, page 3, "data submitted [for regulatory use] must include verification of appropriate QA/QC to be considered in the Assessment." WQP Policy 1-11, Chapter 2, page 1, further discusses the Water Quality Data Act codified in RCW 90.48.570 through RCW 90.48.590 that states: "Ecology shall use credible data for the following actions-determining whether any water of the state is to be placed on or removed from any section 303(d) list." The data retrieved from STORET does not meet the requirements for credible data for water quality management. Therefore, Reclamation requests that Ecology remove Project 303(d) listings that resulted from the STORET data.

A substantial number of facilities are Category 5 listings on the 303(d) list for a variety of parameters of which temperature, dissolved oxygen, and pH are the majority listings. Reclamation facilities are not natural, and according to the Water Quality Standards, 173-201A-260, *Natural conditions and other water quality criteria and applications* (1) (a and b), a change in criteria may need to be addressed. Reclamation requests that the climatic conditions and human structural changes related to the irrigation facilities be reassessed for criteria that better reflects the existing environmental conditions and man-made structures.

If there are any questions concerning these comments, please direct them to Ms. Gina Hoff, Water Quality Specialist, at 509 754-0254.

Sincerely,



fol Boris Belchhoff
Ephrata Field Office Manager

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